

EXHIBIT 4

~~HIGHLY CONFIDENTIAL - Carrie Griffiths~~

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
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6)
7) Civil Action No.
8) 5:16-cv-10444-JEL-MKM
9 In re: FLINT WATER CASES) (consolidated)
10)
11) Hon. Judith E. Levy
12) Mag. Mona K. Majzoub
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1 A. Of course it would.

2 Q. Okay. So don't you think it's
3 important to know as the communications director
4 for VNA who has access to and the ability to
5 post on behalf of VNA through this Twitter
6 account?

7 A. I'm not concerned about that. We
8 have an excellent team at headquarters. All of
9 this information is vetted and approved, and I
10 have no concerns about that.

11 Q. All of it is vetted by who?

12 A. By the communications and the
13 legal team.

14 Q. Which communications and legal
15 team?

16 A. I am not exactly sure who everyone
17 is on the team.

18 Q. Okay. Well, you mentioned a
19 communications team in France, and you mentioned
20 a communications team in Veolia North America.
21 You've already described that you had no input
22 whatsoever in the content, sum, or substance of
23 what was tweeted out through this Twitter
24 account, correct?

1 MR. KRAMER: Object to form.

2 A. Correct.

3 Q. So who vetted it? Who vetted the
4 content? Who specifically vetted it?

5 MR. KRAMER: If you know.

6 A. I don't know for sure. Pierre was
7 involved working with the headquarters' legal
8 teams. I'm not exactly sure.

9 Q. So there's a separate legal team
10 for headquarters in France than there is for
11 Veolia North America; is that accurate?

12 MR. KRAMER: Objection; misstates
13 testimony.

14 A. There's a legal team in
15 headquarters, and there's a legal team in Veolia
16 North America.

17 Q. The legal team in headquarters,
18 are those French attorneys or American
19 attorneys?

20 A. I don't know.

21 Q. When you're referring to the legal
22 team for Veolia North America, are you referring
23 to lawyers who are on this deposition, or are
24 you referring to an internal legal team or some

1 combination of both?

2 A. It depends on the situation.

3 Q. In terms of the situation

4 involving the Veolia Flint Facts handle,

5 @vnaflintfacts, who from -- which legal team was

6 responsible for vetting the sum and substance of

7 the tweets?

8 A. I don't know.

9 Q. Who would I ask?

10 A. Pierre Farcot.

11 Q. Is it your testimony that every

12 single entry, every single tweet that was put

13 out through this Twitter handle @vnaflintfacts

14 was first vetted by communications and legal at

15 Veolia?

16 MR. KRAMER: Objection; misstates

17 testimony.

18 MR. STERN: That's why I'm asking.

19 A. I don't know for sure.

20 Q. Would you have expected it to be?

21 MR. KRAMER: Objection.

22 A. Yes.

23 Q. Why?

24 A. We have a system with

1 Do you recall that?

2 A. Yes.

3 Q. And you mentioned that you assumed
4 that lawyers may have vetted the tweets; is that
5 right?

6 A. Yes.

7 Q. As you sit here today, though, you
8 have no information one way or the other as to
9 whether any of the lawyers involved in the trial
10 reviewed the tweets at all; isn't that right?

11 MR. STERN: Objection to form.

12 A. I have no idea.

13 Q. In fact, you have no information
14 at all as to whether lawyers were involved in
15 any way with any of the tweets, correct?

16 A. Correct.

17 MR. STERN: Objection; form.

18 Q. Do you have any information today
19 as to whether lawyers were involved in one way
20 or the other with any of the tweets?

21 A. No.

22 Q. So to be clear, no one should
23 construe your testimony here today to be that
24 the lawyers involved in the trial were involved